

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BAY MANAGEMENT GROUP, LLC,

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*Plaintiff,*

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v.

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CIVIL RIGHTS DIVISION, OFFICE  
OF THE ATTORNEY GENERAL OF  
MARYLAND, *et al.*,

No. 1:25-cv-2008

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*Defendants.*

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**DEFENDANTS' MOTION TO DISMISS**

Defendants Civil Rights Division, Office of the Attorney General of Maryland and Anthony G. Brown, through their counsel, move to dismiss Plaintiff Bay Management Group, LLC's complaint (ECF 1) pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted. In support of this motion, Defendants rely on the points and authorities set forth in Defendants' memorandum of law in support of their motion to dismiss Plaintiff's complaint filed herewith. Defendants hereby adopt and incorporate the memorandum by reference.

WHEREFORE, Defendants request that this Court enter an order:

- A. Granting Defendants' motion to dismiss;
- B. Dismissing all counts of Plaintiff's complaint, with prejudice; and

C. Providing such other and further relief as is appropriate.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

/s/ James D. Handley  
JAMES D. HANDLEY  
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August 19, 2025

*Attorney for Defendants, Civil Rights  
Division, Office of the Attorney General  
of Maryland and Anthony G. Brown*

**REQUEST FOR HEARING**

Defendants request a hearing on their motion to dismiss.

/s/ James D. Handley

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James D. Handley

**CERTIFICATE OF SERVICE**

I certify that, on this 19th day of August, 2025, copies of Defendants' Motion to Dismiss, supporting Memorandum of Law and proposed order were served by CM/ECF on all counsel of record.

/s/ James D. Handley

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James D. Handley